

Ilan D. Scharf  
 Jeffrey P. Nolan  
 PACHULSKI STANG ZIEHL & JONES LLP  
 780 Third Avenue, 34<sup>th</sup> Floor  
 New York, New York 10017-2024  
 Telephone: (212) 561-7700  
 Facsimile: (212) 561-7777  
 ischarf@pszjlaw.com  
 jnolan@pszjlaw.com

*Counsel for the Plaintiff,  
 Howard M. Ehrenberg in his capacity  
 as Liquidating Trustee of Orion Healthcorp, Inc., et al.,*

UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
	:	
ORION HEALTHCORP, INC <sup>1</sup> .	:	Case No. 8-18-71748 (AST)
	:	
----- Debtors. -----	:	(Jointly Administered)
	:	
HOWARD M. EHRENBERG IN HIS CAPACITY	:	
AS LIQUIDATING TRUSTEE OF ORION	:	Adv. Pro. No. 8-20-08047 (AST)
HEALTHCORP, INC., ET AL.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
JOHN J. LYNCH DBA BOYNTON	:	
& BOYNTON,	:	
	:	
Defendant(s).	:	
-----	:	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

**STIPULATION FOR EXTENSION OF TIME TO ANSWER  
COMPLAINT OR OTHERWISE RESPOND**

Plaintiff and Defendant, each by and through their respective undersigned attorney, hereby stipulate and agree to extend the time for Defendant to answer, move or otherwise respond to Plaintiff's complaint as provided for herein:

1. On March 13, 2020, Plaintiff filed a complaint [Dkt. No. 1] against Defendant.
2. The Summons [Dkt. No. 2] was issued by the Clerk's Office on March 16, 2020.
3. On March 16, 2020, Defendant was served with the summons and complaint.

Defendant does not challenge personal jurisdiction and waives any objection to service of process in this adversary proceeding.

4. Defendant does not waive any other defenses, objections or challenges which it may bring in this action other than as expressly stated in the previous paragraph.

**WHEREFORE**, the parties agree that the time by which Defendant is required to answer, move or otherwise respond to the Complaint is hereby extended through and including May 15, 2020.

Dated: April 15, 2020

Dated: April 15, 2020

**PACHULSKI STANG ZIEHL & JONES LLP**  
Attorneys for Plaintiff Howard M.  
Ehrenberg in his capacity as Liquidating  
Trustee of Orion Healthcorp, Inc., et al

**AKERMAN LLP**  
Counsel for Defendant John J. Lynch dba  
Boynton & Boynton

By: /s/ Jeffrey P. Nolan  
Ilan D. Scharf, Esq.  
Jeffrey P. Nolan, Esq.  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Tel: (212) 561-7700  
Email: [ischarf@pszjlaw.com](mailto:ischarf@pszjlaw.com)  
[jnolan@pszjlaw.com](mailto:jnolan@pszjlaw.com)

By: /s/ Thomas B. Fullerton  
Thomas B. Fullerton  
(Pro Hac Vice Motion Forthcoming)  
71 South Wacker Drive, 47th Floor  
Chicago, IL 60606  
Tel: 312 634 5726  
Email: [thomas.fullerton@akerman.com](mailto:thomas.fullerton@akerman.com)